



Public Comments on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program, Los Alamos, New Mexico

Public Meeting
Wednesday July 30th, 2003
6pm - 8 pm
Fuller Lodge
Los Alamos, New Mexico

Comments to be considered in the Environmental Assessment (EA):
Please use other side if necessary.

Please organise another actual meeting with a public discussion and LANL presentation... advertise IN ADVANCE in the Los Alamos monitor, Santa Fe New Mexico and Albuquerque Journal!
Thanks

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

☐ **Yes**

☐ **No Thanks**

If "Yes", where should it be sent?

If you would like to mail your comments send them to:
Elizabeth Withers, NEPA Compliance Officer
Los Alamos Site Office
528 35th Street, Los Alamos, NM 87544; via fax (505) 667-9998; by e-mail to: ewithers@doeal.gov; or by calling (505) 667-8690.

The public comment period ends August 5, 2003.



DOE/EA-1431

Predecisional Draft
Environmental Assessment for the
Proposed Los Alamos National Laboratory
Trails Management Program,
Los Alamos, New Mexico

I am an avid dog-walker - use WE trails each day - I try to be good sensitive - clean up after my dogs - pick up trash / broken glass on trails. As more open space is developed more people are vying for recreation on increasingly smaller less available land - Overlook has in the past 10 (even 5) years just exploded with multiple use trail-users. I relish the peace and solitude and beauty the LANL trails afford. I've lived in Los Alamos 27 years and see our recreational land diminish and what we have is becoming heavily used - Please don't take this land away from us. This land is as sacred to me as my land the Indians say is sacred to them - it is one of the main draws for living here. Few communities boast such beauty so close to dwellings - just so very isolated once on trails.



July 14, 2003

Kathy Clifford



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The Trails Management Program is an unnecessary expense to the public. It is not necessary & will restrict the public. It will be extremely costly, & impossible to enforce. I truly hope you do not implement this program. If you would like a response please provide your name and a mailing address:

David Francisco

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes ☒

No Thanks ☐

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Closing or severely limiting the recreational use of the area south of Pajarito Acres would be a disaster for our community. This is the only extended recreational area close to White Rock. Its availability and use for hiking and horse back riding played a major role (and hopefully continues to do so) in the attraction to new hires to the Lab. (I did for me and my family). It is also an important area for training of rescue dogs (Mountain Canine Corps).

If you would like a response please provide your name and a mailing address:

J. Birn, [redacted]

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Yes ☒

No Thanks ☐

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address above

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The population (residents) of LA County are underrepresented on the proposed group of cooperating agency. LA County government is the only one representing residents and the others are non-residents. This could lead to a very biased set of recommendations against the interests of the people most affected.

If you would like a response please provide your name and a mailing address:

Harland H. Howard

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes

No Thanks

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It appears that the socioeconomic and health and safety impacts of the Proposed Alternative & Proposed Action may be too narrowly focussed to address actual/real effects. Should consider property values, ability to exercise, practice, etc in economic & H&S resources.

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes

No Thanks

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Los Alamos Pony Club and
Pajarito Riding Club would be
happy to help with the
trails behind Pajarito Acres.

If you would like a response please provide your name and a mailing address: Nora Aubert

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes ☒

No Thanks ☐

If "Yes", where should it be sent?

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Don't forget to use Pajarito Riding Club and
Los Alamos Pony Club as resources for
1) Trail Identification 2) Hazard/trail condition alerts 3) Trail fixups (we already do trail fixups every month!)

If you would like a response please provide your name and a mailing address:

Nancy Ambrosiano (of both of the above orgs)

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes ☐

No Thanks ☐

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*Los Alamos Pony Club
and other horse owners in the area would
like the trails to stay open because they are
the only place nearby to trail ride and condition
out horses.*

If you would like a response please provide your name and a mailing address:

Would you like us to send you a copy of the final EA and Finding of No Significant Impact?

Yes ☒

No Thanks ☐

If "Yes", where should it be sent?

Laura Ambrosiano
[Redacted]
[Redacted]

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I was not able to attend the EIS public comment meeting of July 30, but would like to comment if there is still time.

I am a mountain biker and use the trails within LANL boundaries. I am firmly opposed to any closure of these trails for public use. These trails are on public land and should continue to be available for public use. Security areas can be protected from perceived threats by fencing and security services. The alternative to eliminate public access is analogous to preventing road fatalities by eliminating driving; it will certainly work, but is not in the public interest.

LANL has recognized that cyclists pose little or no threat to government facilities and I urge you to take the same approach with recreational users of LANL trails.

Thank you for the opportunity to comment.

David Shrimpton, Sr. Project Manager

DOE,

The option to close DOE land for recreational use should not be considered at all. Most of the DOE land on which people hike, ride, and bicycle is not used for anything else and isn't even considered for other uses. It has no (significant) cultural resources that need protecting. In limited locations there may be cultural resources that do need protecting, but that can readily be done without impacting most of the area in question. Furthermore, DOE land is already protected heavily in that uses is limited to non-motorized vehicles, no hunting, trapping, or shooting, etc. This is sufficient.

Los Alamos is embedded in DOE owned land. Land transfer to Pueblos is already taking quality recreational land from Los Alamos citizens. Removing more land that would then sit unused is a travesty.

This smacks of creating a task for people and not of a sensible consideration.

I believe the "do nothing" option is the most logical, followed by doing almost nothing except protecting limited clearly cultural resources.

Wendy Soll

Dear Ms. Withers;

Please accept these comments regarding the PREDECISIONAL DRAFT ENVIRONMENTAL ASSESSMENT FOR THE PROPOSED LOS ALAMOS NATIONAL LABORATORY TRAILS MANAGEMENT PROGRAM, LOS ALAMOS, NEW MEXICO.

As a LANL employee and resident of Los Alamos County, I regularly use trails within LANL for recreation and fitness. I strongly oppose the closure of trails at LANL. **The public should continue to have access to trails while the trails management plan is in development.**

Los Alamos residents have reduced access to hiking and running trails due to closures at the San Ildefonso boundary, the LANL boundary, and the Cerro Grande Fire areas of the Santa Fe National Forest. These closures make access to trails on LANL even more important to the quality of life and the health of local residents. Reduced outdoor recreational opportunities also reduces the business opportunities of local shops which profit from supporting outdoors recreation, such as bike rentals and equestrian supplies.

As a LANL employee, I rely on access to trails at LANL for daily exercise. Restricting hiking and running to paved roads reduces the quality of the work environment for LANL employees.

Thank you,

Steve Koch

Monday, August 4th, 2003.

Elizabeth,

Please accept this email message my as my public comment on the Predecisional Draft Environmental Assessment for the Proposed Los Alamos National Laboratory Trails Management Program.

First, given that very little public notice was provided regarding this matter I think that DOE/NNSA should extend the public comment period beyond tomorrow's date of August 5th, 2003. I was made aware of last Wednesday's meeting shortly before it occurred, already had commitments and could not attend. I was only today, August 4th, provided with information (your address) on how to provide written input.

I am strongly opposed to a wholesale closure of ALL trails on LANL property.

As a LANL employee and Los Alamos resident, I have routinely use these trails for recreation and fitness. In the past few years LANL has made a really big deal about HEALTH and safety here at the lab. Closing all trails would in my opinion, severely impact the ability for many of the LANL workforce to maintain and improve their health. Many of us due to location or time constraints or preference can't go to the gym, but can easily access LANL trails to exercise or walk. In addition, when the trails near my office are open, I often go for walks to think about work.

I also believe that the local trails both on and off laboratory property are the towns biggest asset. I now live in Santa Fe, but lived in Los Alamos for 6 1/2 years from Jan 92 to Jun 98. As a former resident who still works at the lab, I will say that the biggest thing I miss about Los Alamos is the trails. Had this proposal been enacted during the time I lived here I would have strongly considered leaving the laboratory as the local trails and the recreational opportunity they afford are in my opinion one of the few positive things living in Los Alamos offers. I currently hear that many people will leave Los Alamos if the UC Contract goes away. I know many people who live in Los Alamos who would further consider leaving if the trails were closed. I know that DOE/NNSA is concerned about retaining the workforce. They should consider this.

I will admit that due to the Cerro Grande fire there are are sections of current trails that that may dangers due to falling tree hazards, however the solution is not to close the trails but to remove those hazards in the areas where they exist. Even if trails are closed to the public and general LANL workforce, programmatic access to these areas will still continue. Shouldn't these trails be made safe for those that are required to work there and if so doesn't that solve expressed safety issues? There may also be trails that pose security risks, but the solution is to not close those trails but allow the insecure sections to be rerouted.

With respect to trails that might provide access to tribal lands, it has always been my understanding that accessing those lands was off-limits and I have to the best of my ability honored that. Instead of closing those trails the solution might be to better educate the public that tribal lands are off-limits. In addition maybe the Lab and the Pueblos should provide signage where trails do access or offer the possibility to access those lands. The signs could even be placed on the trails at a distance from the actual tribal boundaries, i.e., saying please turn around now.

There are also many LANL trails on the perimeter of the lab that if closed would as a result close trails on public lands. I know this because many public trails are currently inaccessible due to current LANL fire-danger-related closures. This is my biggest problem with the proposed wholesale closure of ALL LANL trails -- not that the LANL trails will close, but that non-LANL trails will become permanently inaccessible because of the LANL closures.

Reading the draft it appears that it was written by people that have never and will never use the local trails. I strongly urge DOE/NNSA to consider a plan that balances safety/security and quality of life instead of the easier bureaucratic solution which is wholesale closure.

Please send any correspondence to this email address or to:

Brad Perkins

Ms. Withers,

I did not attend the meeting you held in Los Alamos regarding studies to determine the future disposition of canyons and mesas owned by DOE and now open to the public. There was little advance notice of the meeting, but I am writing to comment as requested in the Los Alamos' Monitor's article reporting your meeting.

I am disturbed by the comment attributed to Mr. Dan Pava suggesting to the reader that the present de facto "do nothing" policy requires revision. Doing nothing has worked well for over 40 years. Evidently only scientists and engineers are taught that if it ain't broke, don't try to fix it!

I can find no justification that the trails complex requires the evaluation that you propose to make. It seems to me that it is possible to find a regulation that requires you to spend taxpayer dollars, albeit for no really good purpose. I personally intend to recommend to my elected representatives that the the studies you are proposing be treated as career-ending, or at least career-limiting for those who plan the study. One would like to think that the local area office of the DOE is much closer to the issues than the Albuquerque office. In thirty years of working for AEC, ERDA, and now DOE, I have been impressed with the futility of dealing with the Albuquerque DOE office. Once again, people from Albuquerque are offering us all the assistance possible short of actual help.

I live at 160 Monte Rey South, directly across from a main access trailhead leading to DOE land that is open south of Pajarito Acres. I have lived at this location for about 30 years, and have been through three major forest fires, the La Mesa, Dome, and most recently the Cerro Grande fire. Fire from Pajarito Canyon isn't a particular danger because it has never supported a population of large conifers that can support a crowning fire. Perhaps I am a naive scientist to believe that a forest is required before one can sustain a forest fire? Perhaps the seasonal closures you suggest are necessary to prevent virtual fire? My recollection is that the most serious fires in Los Alamos history were caused by the U.S. government's effort to prevent a major fire. Your fire argument isn't likely to sell in this town.

Fire is even less a danger following the wholesale clearing that the DOE conducted to remove dead and dying Pinons, and evidently any other tree that got in the way of the heavy machinery that was used to clear the land. I am not amused by the logic that closed formerly open land, for example lower Water Canyon, because it was deemed too fragile for public use. I regret to inform you that the DOE's contractors used tracked vehicles to completely destroy these fragile lands. Evidently you hired the lowest bidder to do a job best left for nature to heal. I comment that you omitted to discuss that the DOE made only token effort for remediation of the land. Remediation was made to repair the contractor's damage. The ruts were smoothed, more or less, and antiquities marked but no new trees are planted. You did not make the best argument for potential closures, viz. that the public would be prevented from knowing how badly the DOE has treated this land. Very little remains here that requires the DOE's assistance, but we could use a little help.

The matter of access to Pajarito Canyon requires that you be given a history lesson. Perhaps owing to short government careers, none of the DOE representatives seem to know why the land is open for public access. Forty years ago, the land that is now occupied by Pajarito Acres and La Senda was sold by the AEC to prospective home owners and land speculators, respectively, to create the only rural-agricultural zoning in Los Alamos county. Access to Pajarito Canyon and the land East and South of State Route 4 was an incentive for horse-owning home-owners to build in Pajarito Acres, and later for the developers of La Senda to extend the Pajarito trails. The trail system in these developments was constructed specifically to provide access to the land that was retained by AEC. Today, the DOE continues to hold title to the land because doing so benefits the residents of Los Alamos county. Keeping these DOE lands open for public use supports our community.

People in Albuquerque cannot be expected to understand the remarkable history of the government-held land in Los Alamos county. However, you can be expected to understand the statements made by the present and past DOE Secretaries and the NM congressional delegations that mandate support for the communities nearby DOE facilities. Your statements as reported in the Los Alamos Monitor article lead me to believe that you understand neither forest fires nor the DOE's stated policy. The DOE retains title to the land you want to study because keeping it open benefits the community, and has done so for over forty years.

In my opinion, a trails management plan by the DOE is neither desirable nor necessary. The Pajarito Riding Club and the Los Alamos Pathways organization have shown that the community is perfectly capable of meeting the requirements of riders, hikers, and the trail-using public. Thank you for your offer of assistance, but it is not needed here. Future issues that may arise can be handled perfectly well by citizen groups and the local Los Alamos Area Office of the DOE that is more properly our point of government contact. I believe from the Monitor's reporting of your meeting that you received this message from many citizens concerned about your proposal for a study to consider changing what has worked well for nearly half a century. My comment to you expands on their message.

Maxwell T. Sandford II

To whom it may concern:

I am the leader of the White Rock Senior Center Walking Group. We take walks every Friday, many of which are in Los Alamos County. We are accustomed to use many of the trails listed in "Fifty Hikes in Los Alamos County" and in the books by Dorothy Hoard and Craig Martin. The closing of the trails on DOE land has not impacted us this summer, because we go further up into the mountains, looking for cooler routes. However, as the fall approaches, we usually use the trails closer by, namely off Route 4 and Route 501.

Moreover, we frequently meet other people enjoying these trails. I can understand closing trails because of fire danger, but after the summer is over I hope that they will again be available to the public. It would be a shame for all the people who enjoy hiking, walking their dogs and horseback riding to be deprived of this healthy exercise.

As for trail maintenance and signage, I suggest leaving them alone. Those who use them have no difficulty finding them, and although some are eroded, that doesn't seem to be a major problem.

I am also concerned about being ticketed along 501. We plan to hike the American Springs road in Sept. and we usually leave a car at the water tower on 501 so we can hike all the way down. We have to worry about getting a ticket? We also hike upper Pajarito Canyon, which involves pulling into a parking area off 501. Is this a ticketable area?

I strongly urge you to remove the ban on using these trails at least by September. Please advise me of your decision.

Mary A. Nunz

Please accept the following input re: the trail management proposal.

1. THIS PROCESS HAS LACKED PUBLICITY AND OPPORTUNITIES FOR INPUT. I strongly suggest you re-publicize this process in the CONVENTIONAL way, via PRESS RELEASES to ALL local news outlets, including the paper I read, *The Santa Fe New Mexican*, well in advance of the "informational" gathering. My comments about your ads are: (1.) I rarely see them and (2.) when I do they usually provide inadequate information to understand what they are about.

2. This is the information age. Someone should not have to physically go anywhere to get information about this proposal or make phone calls. Make the draft of the proposal available ONLINE.

3. ALLOW LONGER FOR COMMENT. We learn of this on July 30 and comment is due by August 5? Outrageous.

4. Bearing in mind that I have not read your draft proposal, since the copy my husband requested more than a week ago has yet to arrive, please accept these additional comments. While the *Los Alamos Monitor* may have depicted otherwise, I am a hiker and I share the Pajarito Riding Club's concerns about **any** trail closures. I am firm in my belief that ALL TRAILS should remain open, although they should also be adequately maintained and patrolled.

5. I find the neglect of DOE lands, especially considering that they are near some of the premier archeological sites in the Southwest, to be appalling. I just can't help but feel that an agency with a \$2 billion a year budget for the operation of LANL cannot find a few hundreds thousand dollars to hire professionals to oversee, better patrol and provide upkeep of these facilities. Why, for example, is it only civilians hauling trash out of these areas? Why are so many abuses, such as the cutting of new unauthorized trails, unauthorized vehicle access and ongoing erosional problems, allowed to go unaddressed?

5. While, in conclusion, I support the idea of a trail-management program, I am profoundly concerned that the trail-evaluation program might "take 10 years." THAT IS TOO LONG. The damage is now, it is ongoing, this should not take 10 years. I urge the DOE/National Nuclear Security Administration to move expeditiously, prioritize areas in urgent need of attention, and attempt to have this program up and running IN FIVE YEARS OR LESS!

Thank you for this opportunity to comment.
Kathleene Parker

Elizabeth,

As a concerned resident of White Rock, NM, who has hiked many of the trails under consideration for "a trail management program" or closure action around WR and in the rest of LA county I have a few comments.

1) In the 25 years I have hiked the trails I have never seen significant destruction by vandalism or hiker caused fires in the vicinity of any trail. The only damage has occurred in areas in the Jemez used for parties or intentionally burned by the forest service that got out of control. The hikers, bikers, and horse riders that use these trails have never damaged them and no reason exists from that perspective to consider any action other than leaving a good situation well enough alone.

2) The trails near WR have now been damaged unbelievably by contractors working for LANL under the guise of fire mitigation. The work has decimated the remaining forest leaving exposed ground that is already eroding and will continue to erode for years, in the misguided belief that somehow a fire could start and devastate WR. In fact, in the early 1980's a fire did occur (lightening cause I think) in WR canyon south of WR. It was unable to spread due to the nature of the terrain and the sparse low growing pinon forest, and by the way the very hikers, bikers, and horse riders you are considering punishing by closing access to the trails we

3) The trails under discussion, in the WR area, are well established, and provide a recreational resource beyond value. Those near LA serve the same purpose, and were hurt severely by a government activity that was allowed to get away from the people who caused the Cerro Grande fire. Again, a case of trying to cure a problem and causing a worse one.

Leave these trails as they are and put the money and effort into restoring the LA trails and extending that system, rather than contemplating "managing" or closing the trails we all use. There is nothing wrong with the present open system. Leave it alone.

We have had a great example of how well our government manages our resources in the fact that even today, years later, we are still not able to access the Valle Caldera region that we the taxpayers spent 90M\$ on. The only folks able to use it are those willing to pay exorbitant amounts simply to walk 3 miles on an old dirt road, or even higher amounts to fish in a stream they own.

If it ain't broke, don't fix it.

Leave my trails alone and let me continue using them.

Bob Watt

I read the LANL Bulletin Board item on July 17 about a public meeting concerning a Trails management Program. One passage in the item got my attention:

"The trails closure alternative would result in the closing of all existing trails to the public and Laboratory workers for recreational use purposes."

As one of the many LANL employees who regularly use the trails for running and bike riding (except of course under the present fire closure), the possibility of a complete closure concerns me greatly: access to the trails is one of the added benefits of working here. Closing the trails would seriously degrade the quality of the work experience for many people.

I am opposed to the possibility of closing the Lab trails. I hope that the proposed trails management program includes other, non-closure options ?

Richard Hughes

Thank you for the opportunity to comment. It is unfortunate that the NEPA process resulted in a total closure alternative, which had the effect of focusing attention on that rather than the actual management program proposed. I believe the total closure idea is untenable - it would lead to various kinds of protest including trespass, and likely legal or legislative action to force DOE to reopen the trails to their historic open access.

A Trails Management Program is a good idea. If properly executed, it will best satisfy the needs of trail users and environmental stewardship. If the trails were simply closed, management would tend to ignore the trails, which could lead to erosion and loss of the historic routes and rights-of-way. If the trails were left in their present unmanaged situation, maintenance, erosion, and growth of unwanted shortcuts and social trails issues would continue.

The EA could adopt a more positive tone in discussing the preferred alternative. Trail availability is an important quality of life factor in living and/or working in Los Alamos. The proposed Trails Management Program would make these trails even more attractive.

I would like a copy of the final EA and FOSI. Please mail to Roger Perkins,

As a member of a volunteer Search and Rescue organization, Mountain Canine Corps, I would like to let you know how important much of the DOE land is to us. We train as a group two times a week throughout the county with our canine search partners. It is important to our training to use many different areas so that the dogs do not become used to working only in certain places. The fire certainly had a negative impact on our training, and I foresee the closure of DOE land as also being a negative factor. Please keep these areas open to the public so people like us can use them, enjoy them, and appreciate them. We see ourselves as servants of the public, just as the DOE is a servant of the public. Let's please work together and keep the land open to both volunteer organizations, and those enjoying recreational activities. Thank you for considering this in your decision.

Terry DuBois, Mountain Canine Corps member since 1986.

Comments to be considered in the Environmental Assessment (EA):

A brief look at this report seems to suggest problems far more serious than actually exist. Matters such as inconsistent signs should be easy to fix. If other jurisdictions are concerned about access, that is for them to work out. Safety is hardly a consideration, let alone a justification. It is hard to imagine a safer activity than hiking trails; risks of sprained ankles are far outweighed by increases in depression from a feeling of confinement, especially confinement for arbitrary reasons.

Beginning with the Manhattan Project there was a recognition that Los Alamos is an isolated area and there should be opportunities for recreation as a means of maintaining morale. Los Alamos without convenient access to the outdoors, or even with reduced access, is a devastating prospect.

NNSA has a limited mandate for providing recreation. It also has no mandate for making miserable the lives of its contractor employees. The best option is to do as little as possible and to keep present trails open.

If you would like a response please provide your name and a mailing address:

T. J. Shankland

Comments to be considered in the Environmental Assessment (EA):

Please use other side if necessary.

On page 8, the "Pertinent Trails Issues" all point to the closing of the trails. More emphasis should be placed on the historic use of trails by LANL and public. It should also include the fact that the work force and the community have significantly benefited by access to the trails. For example, being able to take a walk or bike ride at lunchtime is both a physical and mental health benefit. I don't think anyone who doesn't live here or who is not physically active can appreciate the significance of the access to trails issue. The availability of these trails played a large part in my decision to work here. The specter of having to drive someplace to take a walk makes me cringe and wouldn't help the environment or my piece of mind much. Having the trails closed because of fire danger is bad enough, having them closed permanently would significantly affect myself and many others.

On page 11, the first paragraph of section 2.0 says that closing the trails is a reasonable alternative. I disagree. This is an extreme and unreasonable alternative in my opinion. But due to budgetary constraints and liability fears, it could well be the most attractive alternative to bureaucrats.

The overall management plan proposed appears to downplay the importance of the current use of the existing recreational trails at LANL. The management plan appears to me to be over-management and portends significantly restricted use of existing trails. It also appears to be expensive and personnel intensive. While I applaud efforts to get things in order and hire more environmental professionals, my past experience is that a too ambitious plan is doomed to failure, especially when priorities shift away from those outlined in this EA (as they most surely will in times of budget crises).

As a side note, if we're worried about vandalism of existing cultural resources, highlighting them with pink tape tends to attract attention rather than restrict it. Personally, I rarely leave the established trail to go exploring, but pink tape on trees, fences, or bushes is like an invitation to go see something interesting. Thank you for this opportunity to comment. I would like to be involved in employee or local groups pertaining to this subject. I will even volunteer for trail maintenance.

Kathleen M. Gruetzmacher